

SB

AKA: USAO 20111R00570

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

ANDRE LAMONT TYLER,

Defendant

CRIMINAL NO. **DKC 11 CR 0405**

(Unauthorized Use of Access Devices,
18 U.S.C. § 1029(a)(5); Mail Theft,
18 U.S.C. § 1708; Aggravated Identity
Theft, 18 U.S.C. § 1028A(a)(1);
Forfeiture, 18 U.S.C. §§ 1029(c)(1)(C)
and 1029(c)(2), 21 U.S.C. § 853)

INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges that:

Between on or about March 27, 2011 and on or about April 27, 2011, in the District of
Maryland and elsewhere, the defendant,

ANDRE LAMONT TYLER,

knowingly and with intent to defraud, effected transactions with an access device issued to
another person – to wit, a credit card issued by Discover Financial Services, LLC, to J.C. – to
receive things of value during a one-year period the aggregated value of which was equal to or
greater than \$1,000, in the form of automobile parts and gasoline with a total value of \$4,744.76,
in and affecting interstate commerce.

18 U.S.C. § 1029(a)(5)

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
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AT GREENBELT
PROPERTY

COUNT TWO

The Grand Jury for the District of Maryland further charges that:

On or about the March 27, 2011, in the District of Maryland, the defendant,

ANDRE LAMONT TYLER,

did steal and take from and out of a letter box, mail receptacle, mail route and other authorized depository for mail matter, located on Hawkins Creamery Road in Gaithersburg, Maryland, a letter, package, mail and article and thing contained therein, in the form of an envelope addressed to J.C. containing an access device.

18 U.S.C. § 1708 (first paragraph)

COUNT THREE

The Grand Jury for the District of Maryland further charges that:

On or about April 22, 2011, in the District of Maryland, the defendant,

ANDRE LAMONT TYLER,

did knowingly possess and use, without lawful authority, a means of identification of another person, to wit, the name and account number of J.C., during and in relation to a violation of 18 U.S.C. § 1029(a)(5), to wit, unauthorized use of an access device, as charged in Count One of this Indictment and incorporated here.

18 U.S.C. § 1028A(a)(1)

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further charges:

1. As a result of the offense charged in Count One of this Indictment, and pursuant to Title 18, United States Code, Sections 1029(c)(1)(C) and 1029(c)(2), the defendant,

ANDRE LAMONT TYLER,

shall forfeit to the United States of America any personal property used or intended to be used to commit the offenses and any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense.

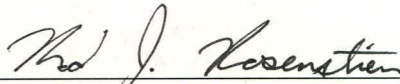
2. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without

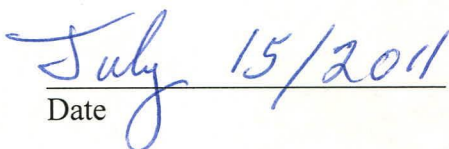
difficulty, the United States of America shall be entitled to forfeiture of substitute property

pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 1029(c)(2).

18 U.S.C. § 1029(c)(1)(C)
18 U.S.C. § 1029(c)(2)
21 U.S.C. § 853


Rod J. Rosenstein
United States Attorney

A TRUE BILL:


Date

SIGNATURE REDACTED


Foreperson